

**UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

UNITED STATES OF AMERICA, )  
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 )  
 )  
 v. ) No. 19 CR 832  
 )  
 )  
JOHNEAK JOHNSON, ) Judge Sharon Johnson Coleman

## FINAL PRETRIAL ORDER

This matter having come before the court at a pretrial conference, and Neny E. Uche having appeared as counsel for Defendant and Michelle Kramer and Lindsay Jenkins, Assistant U.S. Attorneys having appeared as counsels for the Government, the following matters were entered as the pretrial order:

## A. GOVERNMENT'S REPRESENTATIVES

- Michelle Kramer and Lindsay Jenkins, Assistant U.S. Attorneys
  - Chris Labno, Bureau of Alcohol, Tobacco and Firearms

## B. DEFENDANT'S REPRESENTATIVES

- Nenye Uche, counsel for defendant Johneak Johnson

### **C. AGREED STATEMENT OF THE CASE**

The defendant in this case, Johneak Johnson, has been charged with one count of possession of a firearm by a convicted felon.

Johnson has pleaded not guilty to this charge, and he is presumed to be not guilty of the charge.

#### **D. STIPULATIONS**

In preparation for trial in this matter, the parties anticipate the following stipulations:

- Prior to April 28, 2019, defendant Johneak Johnson had been convicted in court of a felony, that is, a crime punishable by imprisonment for a term exceeding one year, and knew he had been convicted in court of a crime punishable by imprisonment for a term exceeding one year.
- On April 28, 2019, defendant Johneak Johnson was the registered owner of a green 2003 four-door Infiniti vehicle bearing Illinois License plate number BB31892.
- Government Exhibits 3, 4, 5 and 6, containing the body-worn camera footage of Chicago Police Department Officers Jared Kundrat, Evangelos Ainalakis, Howard Dixon, and Kristopher Lindsay, and Government Exhibit 7, containing vehicle dash camera footage, all truly and accurately depict events from April 28, 2019, at 33 W. 114th Street in Chicago, Illinois. The timestamps accurately depicts the time and date the videos were recorded.

#### **E. EXHIBITS AND WITNESS LISTS**

- GOVERNMENT'S PRELIMINARY WITNESS LIST

*See* Dkt. 52.

- DEFENDANT'S PRELIMINARY WITNESS LIST

*See* Dkt. 61.

- GOVERNMENT'S PRELIMINARY EXHIBIT LIST

*See* Dkt. 53.

- DEFENDANT'S PRELIMINARY EXHIBIT LIST

*See* Dkt. 60.

- GOVERNMENT'S PROPOSED VOIR DIRE QUESTIONS

*See* Dkt. 50.

- DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

*See* Dkt. 62.

- GOVERNMENT'S PROPOSED PRELIMINARY JURY INSTRUCTIONS

*See* Dkt. 51.

## **F. ANY OBJECTIONS TO WITNESSES**

### **1. Naomi Thompkins and Caziah Walton**

The defense will be objecting to Naomi Thompkins and Caziah Walton being called as a witnesses for the reasons stated in the Defense Motions in *limine*.

### **2. Matthew Savage (only part of his proposed opinion testimony)**

The defense will also be objecting to any opinion testimony offered by police officer Matthew Savage, that claims "that a person can touch and handle an object without leaving any latent fingerprints."

Respectfully submitted,

/s/ Nenye E. Uche

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 13, 2021, I electronically filed Agreed FINAL PRE-TRIAL ORDER with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Nenye E. Uche